

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Lora L. Pringle aka Lora Lee Pringle,	:	Case No. 4-21-bk-00803-MJC
	:	
Debtor	:	Ch. 13
	:	
Lakeview Loan Servicing, LLC	:	11 U.S.C. §362
Movant	:	
	:	
v.	:	
	:	
Lora L. Pringle aka Lora Lee Pringle,	:	
Debtor	:	
and	:	
Jack N. Zaharopoulos,	:	
Trustee	:	

**Reply of Debtor to Motion of
Lakeview Loan Servicing, LLC for Relief from the Automatic Stay**

The Reply of the above Debtor by her attorneys, Doran & Doran, P.C., to the Motion of Lakeview Loan Servicing, LLC for Relief from the Automatic Stay is as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. On November 11, 2022 Lakeview Loan Servicing, LLC filed a Notice with the Bankruptcy Court that is had transferred the loan to NationStar Mortgage, LLC,
5. Admitted.
6. Denied and proof demanded.
7. Denied. It is denied that the Debtor has failed to make the payments indicated. By way of further answer, at the time the bankruptcy case was filed the Debtor had

received a period of COVID related mortgage forbearance from the mortgagee. When the Debtor filed her Chapter 13 Plan the six (6) months of COVID forbearance payments were included in the Chapter 13 Plan. It is believed that Lakeview Loan Servicing, LLC has incorrectly considered the forbearance amounts to be currently due instead of noting for the records that those arrears are being paid through the Confirmed Plan.

8. Denied.

9. Denied.

10. Denied.

WHEREFORE, the Debtor requests that the Motion for Relief be denied.

Doran & Doran, P.C.

By: /s/ Lisa M. Doran
Attorney for Debtor
69 Public Square, Suite 700
Wilkes-Barre, PA 18701
570-823-9111

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Debtor

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Ch. 13

11 U.S.C. §362

Certification of Service

The undersigned, Lisa M. Doran, of Doran & Doran, P.C., 69 Public Square, Suite 700, Wilkes-Barre, Pennsylvania 18701 hereby certifies that on November 21, 2022 a copy of the attached *Reply of Debtor to Motion of Lakeview Loan Servicing, LLC for Relief from the Automatic Stay* was served electronically through ECF on the following parties.

Jack N. Zaharopoulos
TWecf@pamd13trustee.com

Denise E. Carlon
bkgroup@kmlawgroup.com

US Trustee
ustpregion03.ha.ecf@usdoj.gov

Brian C. Nicholas
bnicholas@kmlawgroup.com
bkgroup@kmlawgroup.com

Dated November 21, 2022

Signed: /s/ Lisa M. Doran

Lisa M. Doran, Esquire